L-109, pg. 2

Elizabeth S. Flynn
page 2

November 10, 2001

The project purposes, in part.

All alternatives need to be considered accordingly. Holding State water rights does not guarantee use of federal land and public trust resources for appropriation of the water rights.

C

I support no project alternative until the necessary corrections are made to the project EIS/EIR. However, the project alternative must also provide for mitigation of any loss to the Auburn Cool trail access by including a bridge over the river to prevent the loss of established access.

The loss of the Auburn-Cool trail would be highly significant. Significant in terms of recreation and transportation — but is not unavoidable.

D

Thank you for your consideration.

Sincerely,
Elizabeth S. Flynn

C. The commenter also stated "holding state water rights does not guarantee use of federal land and public trust resources for appropriation of the water rights" and this comment has been noted. The purpose of the proposed project is not simply to exercise water rights, but to utilize those existing rights to meet the water needs of the residents of Placer County and to prevent shortages or a building moratorium. Also, please see Response L-21.A and Response L-112.B.

D. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail.

L-110

GARY W. ESTES
3001 BOWIE AVE. • FORT COLLINS, CO • 80526-2399
PHONE: (970) 337-1621

November 13, 2001 VIA FAX TO (916) 286-0957

Ms. Carol Brown
Surface Water Resources, Inc.
ATTN: American River Pump Station Project
Draft EIS/EIR Comments
2031 Howe Ave., Suite 110
Sacramento, CA 95825

Re: REVISED COMMENTS TO REPLACE THOSE FAXED LAST NIGHT

Dear Ms. Brown:

Thank you for sending all the draft documents to me. I would like to receive a copy of the Final EIS/EIR and all appendices when completed. Please send them to the address above. Also will the final documents be available on a CD?

These personal comments are offered on the above referenced document. To reduce space requirements for making comments, I have abbreviated the Executive Summary as (ES) and the Draft EIS/EIR as (D).

A

1) I am very pleased to support the Proposed Project – Mid-Channel Diversion Alternative. This alternative represents a winning combination of solutions for a number of stakeholders. None of the other alternatives achieve this level of fulfilling the diverse interests of so many stakeholders:

- Placer County Water Agency (PCWA) obtains a year-round source of water while using its water rights in the American River.
- The U.S. Bureau of Reclamation receives a permanent solution to its water-pumping obligation to PCWA and removes the public safety hazard created by the Auburn Dam diversion tunnel.
- The environment wins with a ¾-mile section of the North Fork American River returned to productive use by fish and aquatic life forms.
- The environmentally superior project has been selected even though it is the most costly in short-term economic terms as measured by money.
- The recreational community loses easy access to the Auburn-to-Cool Trail, but wins with re-opening of 4.5 miles of river closed for over 25-years.
- This river re-opening honors the Public Trust Doctrine contained in California's Constitution, which protects the rights of citizens to have access and use of their rivers.

B

2) The table of contents of Appendix D indicates a "List of Acronyms and Abbreviations" on page A-1, but none was found in my copy.

C

3) The volume with Appendices A-G is made more difficult to follow due to the identification system for the appendices. Having Appendix D in Appendix D is an example of where confusion is created. Also having two appendices with the same letter in the same volume

A. Project support noted.

B. A list of acronyms and abbreviations is included in the List of Acronyms and Abbreviations of the Final EIS/EIR. This change does not alter the conclusions presented in the Draft EIS/EIR.

C. Comment noted.

D. Reclamation frequently includes the biological opinion in the Final EIS. Ultimately, Reclamation cannot issue the Record of Decision for an action until it has received the federal resource agencies' biological opinions. Appendix G, National Marine Fisheries Service Coordination and Consultation, is a placeholder for the agency's biological opinion.

E. Please refer to Response L-110.B.

F. The suggested revision regarding the Project History section is included in Chapter 1.0, Section 1.2, Project History of the Final EIS/EIR. This change does not alter the conclusions presented in the Draft EIS/EIR.

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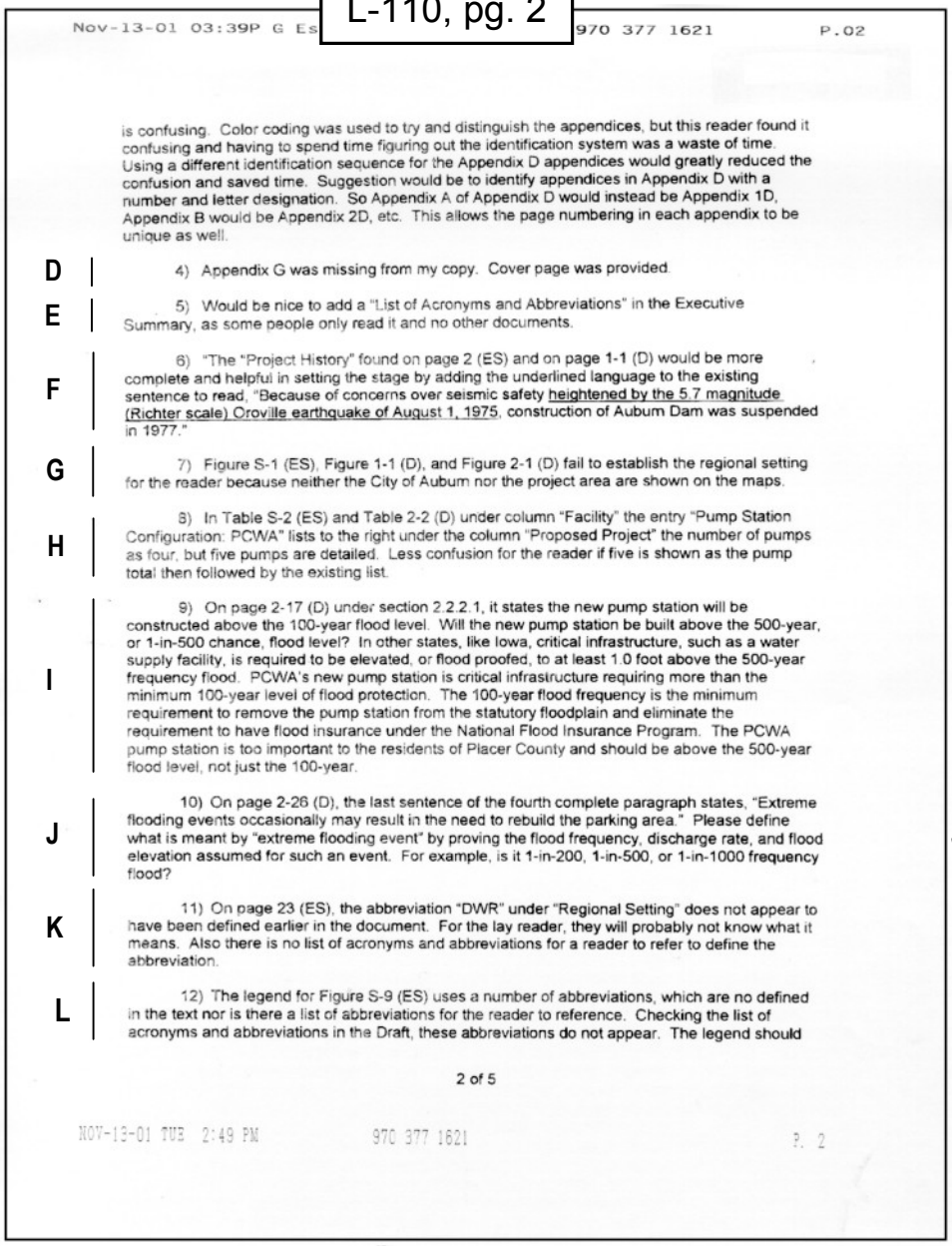

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is confusing. Color coding was used to try and distinguish the appendices, but this reader found it confusing and having to spend time figuring out the identification system was a waste of time. Using a different identification sequence for the Appendix D appendices would greatly reduced the confusion and saved time. Suggestion would be to identify appendices in Appendix D with a number and letter designation. So Appendix A of Appendix D would instead be Appendix 1D, Appendix B would be Appendix 2D, etc. This allows the page numbering in each appendix to be unique as well.

D 4) Appendix G was missing from my copy. Cover page was provided.

E 5) Would be nice to add a "List of Acronyms and Abbreviations" in the Executive Summary, as some people only read it and no other documents.

F 6) "The "Project History" found on page 2 (ES) and on page 1-1 (D) would be more complete and helpful in setting the stage by adding the underlined language to the existing sentence to read, "Because of concerns over seismic safety heightened by the 5.7 magnitude (Richter scale) Oroville earthquake of August 1, 1975, construction of Auburn Dam was suspended in 1977."

G 7) Figure S-1 (ES), Figure 1-1 (D), and Figure 2-1 (D) fail to establish the regional setting for the reader because neither the City of Auburn nor the project area are shown on the maps.

H 8) In Table S-2 (ES) and Table 2-2 (D) under column "Facility" the entry "Pump Station Configuration: PCWA" lists to the right under the column "Proposed Project" the number of pumps as four, but five pumps are detailed. Less confusion for the reader if five is shown as the pump total then followed by the existing list.

I 9) On page 2-17 (D) under section 2.2.2.1, it states the new pump station will be constructed above the 100-year flood level. Will the new pump station be built above the 500-year, or 1-in-500 chance, flood level? In other states, like Iowa, critical infrastructure, such as a water supply facility, is required to be elevated, or flood proofed, to at least 1.0 foot above the 500-year frequency flood. PCWA's new pump station is critical infrastructure requiring more than the minimum 100-year level of flood protection. The 100-year flood frequency is the minimum requirement to remove the pump station from the statutory floodplain and eliminate the requirement to have flood insurance under the National Flood Insurance Program. The PCWA pump station is too important to the residents of Placer County and should be above the 500-year flood level, not just the 100-year.

J 10) On page 2-26 (D), the last sentence of the fourth complete paragraph states, "Extreme flooding events occasionally may result in the need to rebuild the parking area." Please define what is meant by "extreme flooding event" by proving the flood frequency, discharge rate, and flood elevation assumed for such an event. For example, is it 1-in-200, 1-in-500, or 1-in-1000 frequency flood?

K 11) On page 23 (ES), the abbreviation "DWR" under "Regional Setting" does not appear to have been defined earlier in the document. For the lay reader, they will probably not know what it means. Also there is no list of acronyms and abbreviations for a reader to refer to define the abbreviation.

L 12) The legend for Figure S-9 (ES) uses a number of abbreviations, which are no defined in the text nor is there a list of abbreviations for the reader to reference. Checking the list of acronyms and abbreviations in the Draft, these abbreviations do not appear. The legend should

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G. The text of the Draft EIS/EIR (page 3-5) provides further explanation of the regional study area. Key features of the study area (i.e., Folsom Reservoir and the American River) are shown on Figure 2-2, page 2-3.

H. Comment noted.

I. Pages 2-8 and 2-17 of the Draft EIS/EIR state that the Proposed Project would be built above the 100-year flood level at elevation 560 ft msl. At this elevation, the proposed pump station site is approximately 5 feet above the estimated 100-year flood level. This level of flood protection is considered the minimum requirement for this type of facility under common engineering practices. There are currently no requirements to construct water supply infrastructure above the 500-year flood level. Although this specification, as noted by the commenter, is federally-required for critical flood control infrastructure projects, the pump station is not a flood control structure. While PCWA considers the pump station to be critical infrastructure necessary to supply water to customers in its service area, economic considerations would prevent construction of the pump station above the 500-year flood elevation. It is more economical to design the pump station above the 100-year flood level, and design the structure to tolerate inundation from infrequent flood events. To reduce the risk of damage due to flooding, all portions of the diversion structure would be designed to tolerate inundation during flood events greater than the 1½ year, bank-full event. While damage during high flood events may occur, the risks to water supply reliability would be significantly decreased or eliminated, relative to the existing condition.

J. As described in Master Response 3.1.6, Public River Access Features, the lead agencies, in coordination with CDPR, have revised the proposed public river access features and propose only development of riverside parking to accommodate 3 handicap-accessible spaces and a vehicle turnaround area for loading and unloading equipment. It is anticipated that minor maintenance will be required each year.

K. An updated list of acronyms and abbreviations is provided in the Final EIS/EIR. The acronym DWR is used for the California Department of Water Resources. This change does not alter the conclusions presented in the Draft EIS/EIR.

L. The acronyms included on Figure S-9 are included in the updated acronym and abbreviation list provided at the front of the Final EIS/EIR.

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stand-alone with the full names given without abbreviations. This is especially important in an executive summary.

M 13) On page 36 (ES) under "Public Health and Worker Safety," the third sentence from the bottom of is missing the word "in" between "be" and "place."

N 14) On page 39 (ES) in the first complete paragraph the acronym "VELB" is used, but no defined in the text. The common practice is to identify an acronym before using it.

O 15) Chapter 3.0 (D) is difficult to read, as there is no description in the "Introduction" as to where the figures and tables for the chapter are located. When reading the section "3.11 Power Supply," it took me awhile to figure out Table H-3.11-1 mentioned on page 3-268 is located in Appendix H. People do not read entire chapters, but focus on areas of specific interest. They will read the "Introduction" to understand how the chapter is organized and then move on to specific interest. Suggest language be added in the "Introduction" as to the location, or on each page where figures and tables are mentioned indicate where they are located.

P 16) Figure 3.8-2 (D) on page 3-205 only shows parts of the Auburn-to-Cool Trail and Western States Trail. The map does not indicate that the trails are incomplete and in fact extend further than shown. The map should correctly show the trails to the extend of the area depicted on the map or indicate that the trails are not shown to extend they actually exist on the ground in the area depicted.

17) On page 3-263 (D) under "Central Valley Project Hydropower System:

Q a) The first sentence describes the CVP hydropower system having eight power plants and two pump-generating plants for a total of ten plants. Reference is made to Table 3.11-1, which lists eleven plants. Please reconcile the different between text and table.

R b) The third sentence describes the installed capacity at 2,044,350 kilowatts. Reference is made to Table 3.11-1 showing total capacity at 2,085,350. Please reconcile the different between text and table.

18) The following comments refer to both Table S-3 (ES) and Table 2-7 (D) since they appear to contain the same information. My page references will be made to the Draft:

S a) My reading and understanding of the tables would have been easier and faster if some explanation had been provided when the tables were introduced. This could be achieved by taking some language on page 3-3 (D) under "Impact Analysis" and modifying it. Let me suggest the following:

"Table ___ presents the results of the assessment of potential environmental impacts and mitigation measures of the Proposed Project and alternatives. Environmental impacts are grouped as either Facilities-Related Impacts or Diversion-Related Impacts."

Then add the 3rd and 4th sentences of the first paragraph under "Impact Analysis." Replace "effects" in the 3rd sentence with "impacts." Follow this with the first sentence of the second paragraph. Replace "effects" at the beginning of the paragraph with "impacts." Then add the following:

M. This correction is noted in the Executive Summary to the Final EIS/EIR. This change does not alter the conclusions presented in the Draft EIS/EIR.

N. An updated list of acronyms and abbreviations is provided in the Final EIS/EIR. The acronym VELB is used for Valley Elderberry Longhorn Beetle. This change does not alter the conclusions presented in the Draft EIS/EIR.

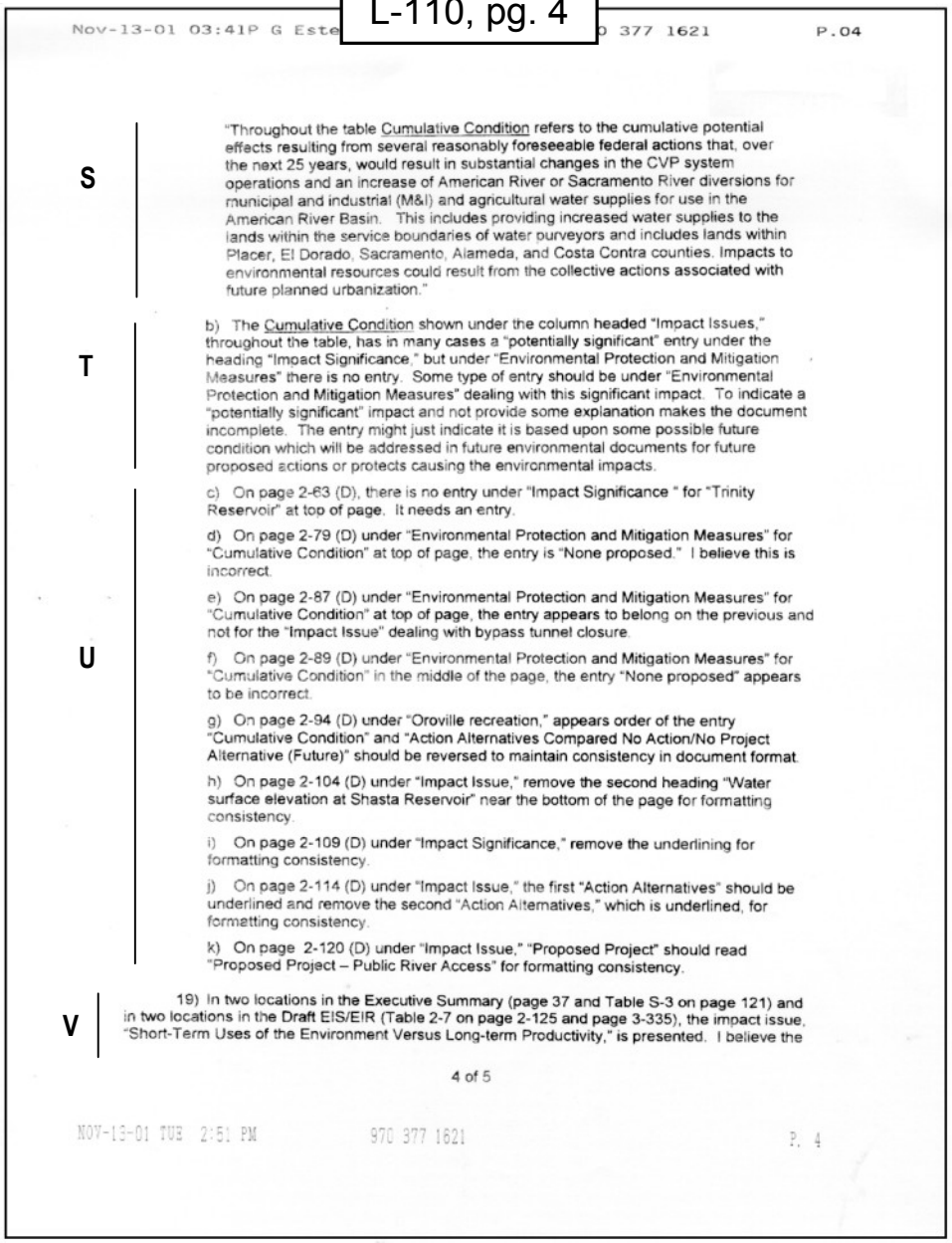
O. The Draft EIS/EIR makes reference to Appendix H in Chapter 3.0, Section 3.3.2, Diversion-related Analysis Framework, paragraph 3, page 3-14. Additionally, in most of the impact evaluation sections, Appendix H is indicated the first time a figure or table located in that appendix is referenced. However, to provide additional clarification, an additional explanation is provided in Chapter 3.0, Section 3.1.1.2, Environmental Consequences/Impact Analysis. This change does not alter the conclusions presented in the Draft EIS/EIR.

P. A revised trails map has been prepared and is included in Chapter 3.0, Section 3.8, Recreation, 3.8.1.2, Project Area Setting. This change does not alter the conclusions presented in the EIS/EIR.

Q. The correction to the description of the Central Valley Project hydropower system is included in Chapter 3.0, Section 3.11.1, Affected Environment. This change does not alter the conclusions presented in the Draft EIS/EIR.

R. The correction regarding the installed power capacity of the CVP hydropower system is included in Chapter 3.0, Section 3.11.1, Affected Environment. This change does not alter the conclusions presented in the Draft EIS/EIR.

L-110, pg. 4



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S

"Throughout the table Cumulative Condition refers to the cumulative potential effects resulting from several reasonably foreseeable federal actions that, over the next 25 years, would result in substantial changes in the CVP system operations and an increase of American River or Sacramento River diversions for municipal and industrial (M&I) and agricultural water supplies for use in the American River Basin. This includes providing increased water supplies to the lands within the service boundaries of water purveyors and includes lands within Placer, El Dorado, Sacramento, Alameda, and Costa Contra counties. Impacts to environmental resources could result from the collective actions associated with future planned urbanization."

T

b) The Cumulative Condition shown under the column headed "Impact Issues," throughout the table, has in many cases a "potentially significant" entry under the heading "Impact Significance," but under "Environmental Protection and Mitigation Measures" there is no entry. Some type of entry should be under "Environmental Protection and Mitigation Measures" dealing with this significant impact. To indicate a "potentially significant" impact and not provide some explanation makes the document incomplete. The entry might just indicate it is based upon some possible future condition which will be addressed in future environmental documents for future proposed actions or protects causing the environmental impacts.

U

c) On page 2-63 (D), there is no entry under "Impact Significance " for "Trinity Reservoir" at top of page. It needs an entry.

d) On page 2-79 (D) under "Environmental Protection and Mitigation Measures" for "Cumulative Condition" at top of page, the entry is "None proposed." I believe this is incorrect.

e) On page 2-87 (D) under "Environmental Protection and Mitigation Measures" for "Cumulative Condition" at top of page, the entry appears to belong on the previous and not for the "Impact Issue" dealing with bypass tunnel closure.

f) On page 2-89 (D) under "Environmental Protection and Mitigation Measures" for "Cumulative Condition" in the middle of the page, the entry "None proposed" appears to be incorrect.

g) On page 2-94 (D) under "Oroville recreation," appears order of the entry "Cumulative Condition" and "Action Alternatives Compared No Action/No Project Alternative (Future)" should be reversed to maintain consistency in document format.

h) On page 2-104 (D) under "Impact Issue," remove the second heading "Water surface elevation at Shasta Reservoir" near the bottom of the page for formatting consistency.

i) On page 2-109 (D) under "Impact Significance," remove the underlining for formatting consistency.

j) On page 2-114 (D) under "Impact Issue," the first "Action Alternatives" should be underlined and remove the second "Action Alternatives," which is underlined, for formatting consistency.

k) On page 2-120 (D) under "Impact Issue," "Proposed Project" should read "Proposed Project – Public River Access" for formatting consistency.

V

19) In two locations in the Executive Summary (page 37 and Table S-3 on page 121) and in two locations in the Draft EIS/EIR (Table 2-7 on page 2-125 and page 3-335), the impact issue, "Short-Term Uses of the Environment Versus Long-term Productivity," is presented. I believe the

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S. Commenter's suggestion regarding clarification of the cumulative condition in the introduction to Draft EIS/EIR Table 2-7 is included in the Final EIS/EIR, Chapter 2.0, Section 2.4, Summary of Alternatives and Impacts. This change does not alter the conclusions presented in the Draft EIS/EIR.

T. An updated summary of impacts and environmental protection measures is provided in Final EIS/EIR, Chapter 2.0, Section 2.4, Summary of Alternatives and Impacts. Suggestions made by the commenter have been incorporated into the updated table. These changes do not alter the cumulative condition impact conclusions presented in the Draft EIS/EIR.

U. The suggested edits and corrections indicated by the commenter have been incorporated into the updated Summary of Impacts and Environmental Protection Measures presented in the Final EIS/EIR, Chapter 2.0, Section 2.4, Summary of Alternatives and Impacts. These corrections do not alter the conclusions presented in the Draft EIS/EIR.

V. The suggested revision to the discussion of "Short-term uses of the Environment versus Long-term Productivity" are provided in the Final EIS/EIR, Chapter 3.0, Section 3.18.5, Short-Term Uses of the Environment Versus Long-Term Productivity. This change does not alter the conclusions presented in the Draft EIS/EIR.

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discussion is limited to the productivity of the proposed project as it relates to impacts upon the human environment and economic viability. I agree with the conclusion:

"The project would have short-term impacts to air quality, habitat of wildlife species, recreation, and noise, but these impacts are not expected to alter the long-term productivity of the natural environment." (page 3-335)

V (cont)

However, I believe there are long-term benefits to the natural environment resulting from the proposed project, which should be recognized. These benefits are identified in the Draft EIS/EIR, but not included in the four locations identified above. I suggest adding the following language in the four locations. The language is based upon that found under Impact 3.5-9 (p. 3-85), Impact 3.5-10 (p. 3-86), and the last paragraph on page 39:

"The Proposed Project includes restoring a previously dewatered channel, resulting in increased habitat availability for fish resources in the project vicinity. This habitat alteration represents a long-term environmental beneficial effect on fish resources and aquatic habitat. Additionally, fish passage from upstream to downstream would be greatly improved through river restoration, resulting in a long-term beneficial impact for fish passage through the project vicinity.

"The Proposed Project would have long-term beneficial impacts on water supply, fish and terrestrial resources, and recreation. On balance, these long-term benefits outweigh the potentially significant short-term impacts to environmental resources in the project area."

20) The section, "Short-Term Uses of the Environment Versus Long-term Productivity," on page 37 (ES) would be more helpful and complete by replacing the existing one paragraph with the two paragraphs found in the Draft EIS/EIR on page 3-335 and by including the language recommended above.

21) The Draft EIS/EIR on page 3-212 states:

"In the interim, the unmet demand for increased parking at the confluence remains a potentially significant and unavoidable impact."

W

I believe there is a potential interim solution to this impact. The City of Auburn and Placer County each have a bus system. They should be contacted about the possibility of their buses being used during the peak summer months to provide transportation to the Confluence area. People go to the Confluence to recreate by swimming, hiking, birding, sunbathing, etc. A bus schedule with 2, 3, or 4-hour intervals might be possible. For example, the Auburn Mini-Bus might be able to change its bus route in the summer to include the Confluence. I think this should be included in the mitigation for this impact as something that will be evaluated. Appropriate changes will be required on page 3-212, Table 2-7 on page 2-87, and Table S-3 on page 83 (ES).

Thank you for considering my comments. Please call me if you have any questions about the comments.

Sincerely,

Gary W. Estes

Gary W. Estes

W. Please refer to Response L-94.I for a discussion of the North/Middle Fork American River confluence topics.

L-111

NOV-12-2001 06:22 PM SMI 530 888 6633 P.01

Placer County Water Agency

U.S. DEPARTMENT OF THE INTERIOR BUREAU OF RECLAMATION

COMMENT CARD
PLACER COUNTY WATER AGENCY/U.S. BUREAU OF RECLAMATION

PCWA AMERICAN RIVER PUMP STATION AND RIVER RESTORATION PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT

NAME:	Dona Abderhalden
ADDRESS:	347 Riverview Drive
CITY/STATE/ZIP:	Auburn CA 95603
BUSINESS AND/OR HOME PHONE/FAX:	530-887-1802
ORGANIZATION (IF APPLICABLE):	

COMMENTS:

Please see 2nd sheet. I couldnt fit them all on this sheet.

PLEASE USE THIS TO SUBMIT YOUR COMMENTS ABOUT THE DRAFT EIS/EIR. YOU CAN SEND ADDITIONAL COMMENTS TO:
DRAFT EIS/EIR COMMENTS, SURFACE WATER RESOURCES, INC., 2031 HOWE AVENUE, SUITE 110, SACRAMENTO, CA 95825
JUST FOLD THIS SELF-ADDRESSED SHEET INTO THIRDS, SEAL, STAMP, AND MAIL. THANK YOU.
☑ *Please check here if you would like to be on the project mailing list.*

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